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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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S.D. OF FLA - MIA

HENRY NARANJO and
MARLENE RAMIREZ,

CASE NO.: 00-6022-CIV-LENARD
MAGISTRATE JUDGE TURNOFF

Plaintiff(s),

vs.

STEPHEN BYRON SMITH, and
PALMER JOHNSON, INC.

Defendant(s).

/

MOTION TO EXTEND PRE-TRIAL DISCOVERY DEADLINES

COME NOW the Plaintiffs, by and through their undersigned counsel, and file this motion requesting the court to extend the discovery deadlines set pursuant to the filing of the Local Rule 16.1(B) Scheduling Report for an additional 120 days and state as follows:

1. The Plaintiffs and the original Defendant, STEPHEN BYRON SMITH, filed a Joint Scheduling Report on April 4, 2000, with proposed dates for a discovery schedule. The Court entered an Order adopting the Joint Scheduling Report on April 11, 2000.
2. Initial discovery was exchanged and several other parties were brought into the case by both the Plaintiff and Defendant. An Amended Complaint was filed on June 22, 2000, and the case is presently pending with HENRY NARANJO and MARLENE

5.1.A.1 & 7.1.A.4

NON-COMPLIANCE OF S.D. Fla. L.R.

H308

Case No. 00-6022-CIV-LENARD

RAMIREZ as Plaintiffs, and STEPHEN BYRON SMITH and PALMER JOHNSON, INC., as Defendants. All other Defendants have been voluntarily dismissed. PALMER JOHNSON, INC., served an Answer and Cross-Claim to the Amended Complaint on all the parties on August 21, 2000.

3. Due to the fact that PALMER JOHNSON, INC., has just entered the litigation, the discovery schedule proposed by the initial parties to the case is no longer appropriate.
4. The Plaintiffs request that the discovery dates presented in the Joint Scheduling Report be extended by 120 days, keeping the mediation and pre-trial stipulation deadlines the same, along with the November 12, 2001 trial date. This proposed scheduling extension will have discovery completed seven months prior to the November 12, 2001 trial calendar.
5. The undersigned has conferred with counsel for all parties and they are in agreement with this request.

WHEREFORE, the Plaintiffs respectfully request the Court to extend the pre-trial deadlines relating to discovery by 120 days.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a true and correct copy of the foregoing was mailed this 29th day of August, 2,000, to:

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Case No. 00-6022-CIV-LENARD

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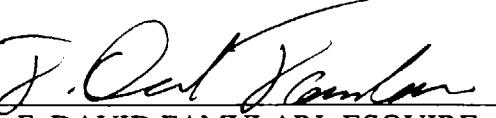
Respectfully submitted,

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BY:


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